



**Denver Environmental Health Department**

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Paula Schmittiel  
USEPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202-11294

July 15, 2013

RE: Vasquez Blvd./ Interstate-70 Superfund Site, Operable Unit 2 Groundwater

Dear Ms. Schmittiel:

Thank you for the opportunity to review the report detailing the results of the four quarters of groundwater monitoring that took place in 2012. After reviewing the report and analytical data, we still maintain that the remedial investigation and feasibility studies, previously completed by Denver and approved by EPA Region 8, adequately characterized the site and remedial options; and, that there is no evidence that the landfill (which is not a part of this Superfund Site) presents an adverse effect on groundwater quality. No further investigation is warranted; the presumptive remedy is appropriate for this site.

To reiterate our position, EPA Region 8 risk assessor, Susan Griffin determined in 2008 that the chemicals of concern for the site were arsenic and lead in surface soils; and, that groundwater was not an exposure pathway to human health or biota receptors; and that the river was not impacted by groundwater. Therefore, groundwater was not further investigated, and the existing data were considered sufficient. In accordance with those determinations, the following documents were submitted by Denver and approved by EPA:

- Quality Assurance Project Plan/Work Plan/Sampling Analysis Plan, approved December 8, 2008;
- Remedial Investigation report, approved on February 23, 2010; and
- Feasibility Study report, approved on October 22, 2010.

In spite of those earlier determinations, in 2011 EPA Region 8 decided to re-investigate groundwater. This new data summary report provides no new information, and does not lead to a conclusion that would have changed the course of the original investigation. Specific technical comments about the report are provided below. However, it seems clear that enough information has been gathered to confirm the findings of the original RI/FS and to proceed with remedy selection.

We have the following comments regarding the report:

1. The report is focused solely on a comparison of the monitoring results to water quality standards and does not include any comparisons between upgradient and downgradient water quality data. In fact, the report does not even include data on the summary table for either of the two upgradient wells except for chloroform in MW-006.

2. Section 4.2.1 – Volatile Organic Compounds states that cis-1,2-dichloroethene (c-1,2-DCE) was detected in MW-001 at concentrations above the Colorado Basic Standard for Groundwater (CBSG) during all four quarterly monitoring events. This conclusion is based on a comparison of sample results to a CBSG of 14 ug/l which is listed in the CBSG along with the MCL of 70 ug/l. The footnote in the CBSG relative to these two values states:

*Where ground water quality exceeds the first number in the range due to a release of contaminants that occurred prior to September 14, 2004, (regardless of the date of discovery or subsequent migration of such contaminants) clean-up levels for the entire contaminant plume shall be no more restrictive than the second number in the range of the ground water quality resulting from such release, whichever is more protective.*

Therefore, the CBSG that should be used would be the 70 ug/l. None of the results from MW-001 exceed this level.

3. Section 4.2.3 – Unfiltered Metals states that iron exceeded the drinking water standard in all five monitoring wells. Section 4.2.4 – Filtered Metals makes a similar statement that iron exceeded the standard in all five wells. However, the report does not contain any data for the two upgradient wells (MW-005 and MW-006). Because groundwater in the two upgradient wells may also contain elevated concentrations of iron, the elevated concentration of iron in groundwater may not be a site specific condition.
4. Despite the presence of iron and the lack of any presentation of data for the two upgradient wells, the Executive Summary and the Conclusions and Recommendations section of the report state that the upgradient wells MW005 and MW006 are free from the types of contamination found in downgradient wells MW001, MW002 and MW003. Based on information presented in the report, this conclusion is not supported. Please provide analytical results that defend this statement.
5. The Executive Summary and the Conclusions and Recommendations sections of the report both make reference to “recent groundwater results from other projects conducted in OU2 suggest that there may be other sources for groundwater contamination upgradient of the landfill.” However, the report does not provide any specifics on this or any references to other projects. Please cite references.
6. The report recommends that additional monitoring wells (elsewhere they refer to these as piezometers) be installed in areas midway between the upgradient and downgradient wells to provide better definition of the water table and better interpretation of groundwater flow directions. This is unnecessary. There is no reason to expect that the groundwater flow directions will be anything other than the overall northwest direction, towards the river, than has already been defined. We cannot see any type of decision that would hinge on verifying a groundwater flow direction that could be off a few degrees either way. Furthermore, as discussed below the proposed locations are duplicative with the locations of other additional monitoring wells recommended by the report.

7. The report recommends installing additional monitoring wells on site immediately upgradient of the landfill to better assess the landfill's contribution to contamination observed in the downgradient wells. These locations would actually be the same as the locations of the piezometers that were recommended to be installed midway between the upgradient and downgradient wells. Furthermore, without review of the water quality data from the two upgradient wells and review of the data from the "other projects in OU2" (see comment 5.) we cannot agree that additional wells are needed.

Again, thank you for the opportunity to provide comment. In light of the results of this groundwater study, Denver proposes that we collaboratively move forward with the presumptive remedy and work toward the delisting of this site.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa Farrell".

Lisa Farrell  
Project Manager  
City and County of Denver  
Department of Environmental Health  
Environmental Quality Division

Cc: Jackie Berardini, Denver City Attorney's Office